

Eyck O. Lugo Rivera

From: Eyck O. Lugo Rivera
Sent: Wednesday, April 3, 2024 5:46 PM
To: Tessie Leal Garabis; Jairo Mellado
Cc: Adriana Vega Hernández; Anna Caban
Subject: RE: Global Sales Group, Corp. v. Senci Power USA, Inc. d/b/a A-iPower Corp., Case No. 23-1213 (SCC), U.S. District Court for the District of Puerto Rico

Dear counsel,

We hereby confirm Tulio and Emily Figueroa's availability for the taking of their depositions between April 23 to April 25. Please confirm final dates and times so I can confirm with our client.

As to Plaintiff's factual depositions of the three available A-iPower representatives, we are proposing the dates of May 16 and 17th for their in-person depositions in Los Angeles. Please confirm their availability for these dates.

Finally, and as to you announced intent to depose Mr. Christopher Giallanza, Plaintiff objects to the taking of this deposition and will serve its formal, detailed objection to the same by separate communication.

Cordially,



Eyck O. Lugo, Esq.

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